

# Exhibit 1

**Plaintiff's 6/10/2020 ESI Search Terms Proposal**

No.	Search Terms	Date Range	Custodians
1	(Ulku OR Rowe OR urowe@google.com) w/20 (bonus* OR cash OR comp OR compensat* OR equity OR evaluat* OR level* OR paid OR pay* OR perform* OR promot* OR raise* OR rate* OR refresh OR review* OR RSU* OR salar* OR stock*)	June 2016-present	Sent by: Jennifer Burdis Diane Greene William Grannis Thomas Kurian Melissa Lawrence Tariq Shaukat Chris Humez Brian Stevens
2	(accus* OR action OR alleg* OR claim* OR class OR complain* OR concern* OR experienc* OR EEO* OR EEOC OR ER OR investigat* OR *suit OR sue*OR suing OR suit*) w/20 (base OR bias OR bonus OR comp* OR discrim* OR equal* OR level* OR paid OR pay OR promot* OR retaliat* OR salar* OR stereotyp*) w/20 (woman OR women* OR female OR male OR men OR gender OR sex)	January 2015 – Present	[To be discussed during upcoming M&C]
3	(Ulku OR Rowe OR (urowe@google.com)) w/20 (accus* OR alleg* OR complain* OR concern* OR EEO OR EEOC* OR investigat* OR bias OR discrim* OR equal* OR level* OR paid OR pay OR promot* OR retaliat* OR salar* OR stereotyp* OR sue* OR lawsuit OR suit OR suing OR woman OR female OR male OR men OR gender OR sex)	November 1, 2017 – September 17, 2019	April Beaupain William Grannis Tariq Shaukat Melissa Lawrence Kevin Lucas Diane Green Thomas Kurian  [must be sent by a Google email address]
4	(Ulku OR Rowe OR urowe@google.com) w/20 (demot* OR horizontal OR join OR move* OR moving OR promot* OR reassign*OR switch* OR relocat* OR report* OR structure OR transfer* OR transition* OR launder* OR AML)	February 1, 2019 – May 15, 2019	William Grannis Kevin Lucas Thomas Kurian Tariq Shaukat  [must be sent by a Google email address]
5	(Ulku OR Rowe OR urowe@google.com) w/20 ((financial) /5 ((V.P.) OR VP OR Head OR lead* OR Vertical*)) w/30 (assess* OR eval* OR evaluat* OR exceed* OR expectation OR qualif* OR	February 26, 2018– February 28, 2019	William Grannis Diane Greene Thomas Kurian Tariq Shaukat Brian Stevens Stuart Vardaman

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	qualification* OR perform* OR poor OR under)		[must be sent by a Google email address]
6	(Ulku OR Rowe OR urowe@google.com) w/20 (assess* OR eval* OR exceed* OR expectation* OR qualif* OR perform* OR poor)	March 17, 2017 - present	William Grannis Diane Greene Tariq Shaukat Brian Stevens Thomas Kurian  [must be sent by a Google email address]
7	(Ulku OR Rowe OR urowe@google.com) w/20 (appl* OR adjust* OR consider* OR criteri* OR evaluat* OR hir* OR interview* OR level* OR nominat* OR opportunit* OR review* OR scor*)	March 17, 2017 – Present	April Beaupain William Grannis Diane Greene Thomas Kurian Melissa Lawrence Kevin Lucas Tariq Shaukat Stuart Vardaman  [must be sent by a Google email address]
8	(Layfield w/2 Diana) OR ([her email address]) OR (Clark w/2 Ranjana) OR ([her email address]) OR (O'Dwyer w/2 Tais) OR ([his email address]) OR (Zazzera w/2 John) OR ([his email address]) OR (Dilip w/2 Venkatachari) OR ([his email address]) OR (Varadachary w/2 Venkat) OR ([his email address]) OR (Mayer w/2 Lucille) OR ([her email address]) OR (Walsh w/2 Ekaterina) OR ([her email address]) w/20 (((V.P.) OR VP OR Head OR lead* OR Vertical*) w/5 (FS OR FinServ OR Financial))	February 2018-present	William Grannis Diane Greene Thomas Kurian Tariq Shaukat

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8a (No hit report run)	((Breslow w/2 Stuart) OR ([his email address])) w/2 (((V.P.) OR VP OR Head OR lead* OR Vertical*) w/5 (FS OR FinServ OR Financial))	February 2018-present	William Grannis Diane Greene Thomas Kurian Tariq Shaukat
9	((Harteau w/2 (Nick OR Nicholas)) OR ([his email address]) OR (Wilson w/2 (Benjamin OR Ben)) OR ([his email address]) OR (Eryurekw/2 Evren) OR ([his email address]) OR (Breslow w/2 Stuart) OR ([his email address])) w/2 (assess* OR eval* OR evaluat* OR exceed* OR expectation* OR qualif* OR qualification* OR perform* OR poor OR under)	June 2016 – present	Diane Greene Thomas Kurian William Grannis Tariq Shaukat
10	((Harteau w/2 Nicholas) OR ([his email address]) OR (Wilson w/2 (Ben OR Benjamin)) OR ([his email address]) OR (Eryurek w/2 Evren) OR ([his email address]) OR (Breslow w/2 Stuart) OR ([his email address])) w/2 (bonus* OR cash OR comp OR compensat* OR equity OR evaluat* OR level* OR paid OR pay* OR perform* OR promot* OR raise* OR rate* OR refresh OR review* OR RSU* OR salar* OR stock*)	June 2016-December 1, 2019	Sent by: Jennifer Burdis William Grannis Diane Greene Chris Humez Thomas Kurian Melissa Lawrence Tariq Shaukat

**Additional Notes:**

- For all custodians, search period ends as of their last day of employment (“LDE”) with Google.
- Diane Greene and Thomas Kurian should be treated as one custodian for purposes of the ESI Search Proposal
- For Diane Greene, relevant search period is July 2015 through LDE, unless shorter period specified.

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- This search is without prejudice to identifying additional custodians or search terms based on information Defendant subsequently provides in the course of discovery.
- This document relates to searches of custodial drives, emails, Google account documents and data, and personal devices. This document is separate from the searches of other databases and platforms, *i.e.* time management, human capital management, recruitment, and finance management systems, which the Parties have discussed. Moreover, this document does not supersede Defendant's duties pursuant to the Federal Rules of Civil Procedure with respect to the production of other information or documents not covered by this document and is without prejudice to Plaintiff's right to receive documents of which Defendant is aware – even if not identified in response to searches – that are responsive to Plaintiff's discovery requests.
- These searches should be read in conjunction with the parties' ESI Protocol in this matter. In addition, we request that you provide hit counts with respect to the searches. We would anticipate that the following hit count information would be included:
  1. Total document universe searched;
  2. Total number of documents with any hit;
  3. Total number of documents with any hit including families;
  4. Total number of documents with hits for each search term;
  5. Total number of documents with hits for each search term by custodian;
  6. Total number of documents with hits for each search term including families;
  7. Unique number of documents with hits for each search term (*i.e.* hit on a given term and no other terms); and
  8. Unique family count per search term (*i.e.* when a family has a hit for only one term and no others).